

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

GLORIA BUSH,

Defendant.

Case No. 2:21-mj-30169

Assigned To : Unassigned

Assign. Date : 4/9/2021

CMP USA v BUSH (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 7, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. §§ 111(a) and (b)

Offense Description

Assault of a Federal Officer Using a Deadly or Dangerous Weapon

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.


Complainant's signature

Special Agent Emily Munchiando, FBI
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 9, 2021City and state: Detroit, Michigan



Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Emily Munchiando, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since approximately September of 2014. I am currently assigned to the Federal Bureau of Investigation, Violent Crime Task Force (VCTF). As part of my duties as an FBI Special Agent, I investigate criminal violations concerning crimes of violence firearms trafficking, and narcotics trafficking. I have experience in the investigation, apprehension, and prosecution of individuals involved in federal criminal offenses.

2. The statements in this affidavit are based on my personal knowledge, my training and experience, and information obtained from other law enforcement personnel and from persons with knowledge regarding relevant facts. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all of my knowledge about this matter.

3. I have not set forth every fact resulting from the investigation; rather, I have set forth a summary of the investigation to date to establish that GLORIA BUSH violated Title 18 United States Code Sections 111(a) and (b) (Assault of a Federal Officer Using a Deadly or Dangerous Weapon).

PROBABLE CAUSE

4. On April 7, 2021, at approximately 6:46 AM, the Drug Enforcement Agency Special Response Team (“DEA-SRT”) approached a residence on Saint Aubin Street in Detroit, Michigan to execute a federal search warrant for the residence and a federal arrest warrant for N.E., a real person whose identity is known to your affiant.

5. A Michigan State Police (“MSP”) trooper was assigned to DEA-SRT to assist with the execution of the search warrant. Specifically, the trooper was responsible for activating her vehicle’s emergency lights and making police announcements as the DEA-SRT team made contact at the front door of the residence.

6. The DEA-SRT team and the MSP trooper arrived at the residence around 6:46 AM. The MSP trooper parked directly in front of the residence, and DEA-SRT members approached the front door of the residence. The MSP trooper activated her car’s emergency lights and began giving loud verbal commands over the car’s loudspeaker, repeatedly stating “police, search warrant.”

7. While the MSP trooper was announcing law enforcement’s presence, DEA-SRT members were at the front door of the house, on foot, knocking on the residence. As they did so, they gave loud commands of “police, search warrant.” While the DEA-SRT members were standing on the front landing of the residence

making announcements, two shots were fired from inside the residence towards the front door where they were standing. These shots were fired approximately eight seconds after the MSP trooper announced law enforcement presence over the loudspeaker.

8. One bullet struck the DEA-SRT police shield that one of the agents was holding. DEA-SRT backed away from the residence, took cover, and advised all responding units of shots fired.

9. After law enforcement officers found cover, the MSP Trooper repeatedly demanded, over the loudspeaker, that the occupants of the house come outside. The MSP trooper continued giving commands on and off for several minutes. The occupants did not immediately comply. Rather, they remained in the residence for almost one hour. At approximately 7:30 AM, both occupants exited the residence and were taken into custody. Law enforcement identified the occupants as GLORIA BUSH and N.E.

10. DEA-SRT members then entered the residence to secure the location. They found no additional individuals inside, but while conducting a security sweep, they observed a pistol in the upstairs bedroom, a shell casing in the living room, a shell casing in the kitchen, and a rifle on the couch.

11. Later that morning, MSP obtained a search warrant for the residence. During the search of the residence, MSP recovered the following items:

- a. One .45 caliber fired ammunition casing in the kitchen near the sink
- b. One .40 caliber fired ammunition casing in the living room behind the couch
- c. One 5.56x45mm rifle on the living room couch
- d. One Smith and Wesson .40 caliber pistol on the bed in the southeast bedroom.

12. MSP transported N.E. and BUSH to Detroit Public Safety Headquarters, where they were both interviewed. Before interviewing N.E., law enforcement read him his Miranda Rights, which he acknowledged and waived. During the interview, N.E. stated the following. N.E. lives at the residence on Saint Aubin with his girlfriend, BUSH. N.E. had gone to sleep that morning at approximately 6:30 AM after having been awake all night. N.E. woke up 15 to 20 minutes later to loud banging on the front door and BUSH screaming towards the door asking what was going on. N.E. heard a couple of pops similar to gunshots, followed by BUSH screaming. BUSH “let off two shots,” then they both ran upstairs. BUSH had shot out the window, towards the door, with a .40 caliber semi-automatic handgun that she owns. N.E. and BUSH had both been in the living room. N.E. believed someone was breaking into the residence. After N.E. and BUSH made it upstairs, N.E. looked out the front window and saw an officer with a flashlight and the officer’s gun. After observing police, N.E. thought maybe someone had been

chased by police to their door. Neither N.E. nor BUSH called 911. Instead, N.E. and BUSH both called their mothers. N.E. heard people yelling “come out with your hands up,” but he and BUSH did not know who the police were addressing. N.E. stated the gun that BUSH used was located either on the table or on the bed in the residence.

13. The same MSP detective interviewed BUSH. Before the interview, the detective read BUSH her Miranda Rights, which she acknowledged and waived. BUSH initially explained that when she began settling down to go to sleep, she heard banging and pounding on the front door of the house. She saw the door being pushed partially open, at which point N.E. shot towards the door using her gun. After the MSP detective confronted her about the details of her explanation, BUSH admitted that she had shot at the front door, not N.E. BUSH stated that she fired two times from her dining room towards the door and that one shot went through the window. BUSH denied knowing that police were at her door. She stated that she thought someone was trying to break into her house.

14. A query of BUSH in law enforcement databases reflected that four firearms are registered to BUSH, including a Smith and Wesson MP 40, .40 caliber pistol, and a SPH Saint Victor, 556 caliber rifle.

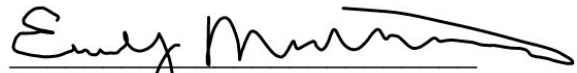
15. On April 7, 2021, BUSH was federally indicted in an unrelated case. On

April 8, 2021, a Postal Inspector transported BUSH to the United States Marshal's Service for an appearance on that indictment. While on the elevator with a Deputy United States Marshal, BUSH made the following unsolicited statements: "I live in the Martin Luther King apartment complex. I shot at you mother fuckers because you were trying to kick in my door and not saying you were the police."

16. The DEA-SRT team members that approached the residence during the execution of the warrants are employees of the United States Drug Enforcement Administration, a federal agency.

Respectfully submitted,

By:



Emily Munchiando
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in
my presence and/or by reliable electronic means.



HON. CURTIS IVY, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF MICHIGAN
Date: April 9, 2021

UNITED STATES DISTRICT COURT

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v.

GLORIA BUSH,

Defendant.

Case No. 2:21-mj-30169
Assigned To : Unassigned
Assign. Date : 4/9/2021
CMP USA V BUSH (kcm)

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) GLORIA BUSH

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. §§ 111(a) and (b) Assault of a Federal Officer Using a Deadly or Dangerous Weapon

Date: April 9, 2021



Issuing officer's signature

City and state: Detroit, Michigan

Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: Gloria Bush

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 12/21/1981

Social Security number: 378-90-9524

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates *(name, relation, address, phone number)*: _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: _____

Date of last contact with pretrial services or probation officer *(if applicable)*: _____
